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April 24, 2012

Via Electronic Filing

Mr. Scot Stone
Deputy Chief, Mobility Division
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Re: Puget Sound Energy, Inc.; Request for Extension of Narrowbanding
Deadline and for Extended Implementation Authority

Dear Mr. Stone:

This is in response to your letter dated April 10, 2012, concerning the April 6, 2012, request of Puget Sound Energy, Inc. ("PSE") for an extension of the Part 90 narrowbanding deadline and for extended implementation authority for certain of PSE's Part 90 station licenses. You have asked PSE to file, between October 1 and October 15, 2012, a supplement to its waiver request containing the following information:

- Which call signs (and location numbers, for any call signs with multiple locations) for which a waiver was requested are not completed and still require an extension
- Why those sites could not be completed sooner, and
- How much additional time PSE needs to complete those sites.

Because PSE cannot vacate its existing wideband VHF and UHF frequencies until its replacement radio system is made fully operational and all users are migrated to it, PSE respectfully requests that the Commission act on its waiver request as soon as possible and not defer a decision until October 2012.

As explained in PSE's waiver request and as further clarified below, PSE is undertaking a complete rebuild of its private mobile radio service ("PMRS") facilities, migrating to a common communications platform from a number of discrete Part 90 radio bands, including an eight-site 900 MHz centralized trunking system, a

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thirty-one site simplex VHF system, and numerous UHF campus radio systems.¹ The new system will consist of a wide area MPT-1327 trunking system operating on channels largely derived from Part 80 Automated Maritime Telecommunications Service (“AMTS”) spectrum in the 217-220 MHz band. The new system will involve new base station equipment at more than 60 radio sites, 75 dispatch console positions, approximately 1,100 vehicular mobile units, and approximately 900 portable units.²

Although PSE originally sought to coordinate and license narrowband channels in the Part 90 VHF high band (150-174 MHz) for centralized trunking operation, PSE soon learned that an insufficient number of channels could be licensed due to other co-channel and adjacent channel licensees. Aside from retaining some of the basic infrastructure at PSE’s current radio sites, the project involves a complete rebuild of PSE’s land mobile radio system.³ PSE decided very early in this project that the company would be able to significantly improve safety, service and features if it were to upgrade the radio system instead of simply narrowbanding the existing VHF and UHF channels.

PSE’s Consolidated Radio System Project is a complex, wholesale system change-out that is comparable in all respects to a system migration to the 800 MHz band, which the Commission has recognized can take more time due to the size and complexity of such a large-scale system replacement.⁴ PSE’s system migration will increase reliability of communications needed by its personnel to maintain electric and gas service to the public and will improve interoperability within PSE’s corporate divisions, such as between the diverse radio systems currently used by Power Production and by Transmission & Distribution Operations, which now use stand-alone radio systems in different Part 90 frequency bands (450 MHz and 150 MHz, respectively).

The new radio system is not compatible with any of the existing radio systems or mobile transceivers currently used by PSE. Moreover, because the new radio system will operate on a unified platform PSE cannot migrate users from their current radio

¹ PSE Waiver Request, at 2.

² PSE Waiver Request, at 4.

³ PSE Waiver Request, at 9.

⁴ County of St. Louis, St. Louis County Missouri, St. Charles County, Missouri, Jefferson County 9-1-1 Dispatch Board of Jefferson County, Missouri, the East-West Gateway Council of Governments; Request for Waiver of Section 90.209(b) of the Commission’s Rules, *Order* in WT Docket No. 99-87, DA 12-245 (PSHSB, released February 21, 2012) (hereafter “*St. Louis Waiver Order*”).

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system(s) until the new system has been fully installed and tested.⁵ As explained in the original request, and assuming the winter storm season is not prolonged, PSE anticipates that it will be able to install much of the radio infrastructure by October 2012, and that it will install new mobile radios in over 1,100 vehicles during the summer and fall of 2012.⁶ However, PSE anticipates that it will not be able to migrate users to the new system and discontinue use of its existing wideband Part 90 facilities until PSE completes construction of the remaining sites and system coverage is tested and found acceptable.⁷ Even though most of the new stations will be installed by the end of 2012, the new radio network cannot be operated until all stations are completed and the entire system is tested in the summer of 2013.⁸

PSE respectfully submits that because of the size and complexity of this project, PSE cannot wait for a decision on its extension request until October 2012. Even if PSE amends its request in October 2012 to provide a list of the new stations that have not been completed as of that time (currently estimated to be about 5-10 stations), PSE will still require an extension of time beyond January 1, 2013, to operate its existing VHF and UHF stations in wideband mode because it cannot remove users from those systems until the new system is fully operational. That is, PSE cannot make a station-by-station migration; it can only make a system-wide migration when all of the new infrastructure (base stations, node controllers, and dispatch consoles) and subscriber units are installed, tested, and operational.

⁵ PSE anticipates that it will be able to commence operation on a small portion of the new system during the spring of 2012 in the vicinity of the company's Lower Snake River ("LSR") wind farm in eastern Washington State. This portion of the network is semi-autonomous from PSE's electric and gas distribution operations in western Washington State. Early operation of the LSR radio facilities will provide PSE with operational data that should be helpful in facilitating turn-up of the rest of the new system in western Washington.

⁶ PSE Waiver Request, at 12-13. Until users are cut-over to the new system, service vehicles will be equipped with two mobile radios.

⁷ Further complicating PSE's ability to initiate station operations is the requirement in Section 80.475(a) of the FCC's Rules that PSE request and obtain modification of its geographic AMTS licenses to authorize any transmitter sites, not otherwise grandfathered, that would create a contour overlap with the service contours of television broadcast stations operating on channels 10 or 13. PSE has initiated this process but will not be able to even test these sites until they are authorized by the FCC. See, *e.g.*, Application File Nos. 0005135126 and 0005135157.

⁸ Even to meet PSE's October 2012 construction targets PSE will be taking some risk in working during the typical winter storm season in the Pacific Northwest.

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PSE believes that a 10-month extension is no more than is reasonably necessary for PSE to vacate its existing VHF/UHF facilities.⁹ PSE has explained that its operating policies restrict it from undertaking major modifications to the radio system during the peak winter storm season of October through the end of March.¹⁰ Thus, PSE reasonably anticipates that any outside construction that is not completed by the end of October 2012 cannot be completed until the spring and summer of 2013, with coverage testing scheduled for July through August 2013, and full cut-over from the old systems completed by the end of October 2013.¹¹ Given the significant cost and operational disruption that can be caused by a project of this magnitude, PSE has every intent and incentive to complete the transition as quickly and efficiently as possible. As stated in the initial waiver request, PSE anticipates being able to relinquish a substantial number of Part 90 VHF and UHF channels once it migrates to the new system.¹²

PSE therefore respectfully renews its request for a waiver of Sections 90.209(b) and 90.155 of the Commission's Rules, and asks that the Commission act on this request as soon as possible. Should the Commission have any questions or require any further information, please communicate directly with undersigned counsel.

Very truly yours,

/s/ Jeffrey L. Sheldon

Jeffrey L. Sheldon

Counsel for Puget Sound Energy, Inc.

⁹ *St. Louis Waiver Order*, para. 7.

¹⁰ PSE Waiver Request, at 14.

¹¹ *Id.*

¹² PSE Waiver Request, at 11.